

Exhibit A

1 Can you say sitting here today testifying
2 under oath that you copied the words from the case
3 report to the arrest report?

4 A. From memory, no.

5 Q. Can you say based upon what you know
6 regardless of if it's from memory as to whether or not
7 you copied the words from the case report to the arrest
8 report?

9 A. I believe that I did.

10 Q. And you believe that you had based upon what?

11 A. Well, the error that's in the case report is
12 also in the arrest report, and the wording is quite
13 similar.

14 Q. Okay. After Dan Casares was handcuffed, did
15 you have any conversations with him?

16 Can I have the documents back, please?

17 A. Yes. Sorry.

18 Q. No problem.

19 A. Yes.

20 Q. When?

21 A. In the hospital.

22 Q. What did you say to him? What did he say to
23 you in the hospital?

24 A. I remember him being apologetic.

1 Q. Anything else?

2 A. In the ambulance ride to the hospital, he said
3 that -- that he would hit my partner again next time he
4 saw her and that he would get his boys and come over and
5 rape my daughter while I watched.

6 Q. Anything else?

7 A. I don't believe so, no.

8 Q. Did you notice at any time whether or not Dan
9 Casares smelled of alcohol?

10 A. I believe he did.

11 Q. Are you assuming that he did, or are you
12 recollecting?

13 A. No. In the ambulance, I remember.

14 Q. Did you ever make a note of that?

15 A. No.

16 Q. All right. Short break.

17 (A short break was had.)

18 BY MR. HORWITZ:

19 Q. Anything else -- Strike that.

20 All right. So you're saying sitting here
21 today now you remember smelling alcohol on Dan?

22 A. Yes.

23 Q. Why didn't you write that in your report?

24 A. I didn't feel that it was pertinent at the

1 time to the battery.

2 Q. Well, why didn't you fill out a report
3 indicating that he had made a threat to your daughter?

4 A. Why didn't I?

5 Q. Yeah. Why didn't you fill out a criminal
6 complaint against him?

7 A. I don't have a daughter, and I included it in
8 the case report.

9 Q. Why didn't you fill out a criminal complaint
10 about that, that he made a threat to a family member of
11 yours?

12 MR. RADIA: Objection, asked and answered.

13 BY THE WITNESS:

14 A. I don't have a daughter, so it didn't make
15 sense to me.

16 Q. But he clearly made a threat to somebody in
17 your family, right?

18 A. And I documented it in the case report.

19 Q. He clearly made a threat to somebody in your
20 family, right?

21 MR. RADIA: Objection, assumes facts not in
22 evidence, asked and --

23 BY MR. HORWITZ:

24 Q. Officer, do not go to where you think I'm